

LAW OFFICES OF
NATALI J.H. TODD, P.C.

NATALI J.H. TODD
MEMBER: NY & MA BAR

26 COURT STREET
SUITE 413
BROOKLYN, NY 11242-1134

Tel: 718-797-3055
Fax: 718-504-3900
E-mail: natali_todd@yahoo.com
www.natalitoddlawyer.com

June 29, 2022

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: U.S. v. Angel Manuel Lopez Padilla, 22 Cr. 275 (NRB)
Bail Modification Request

Dear Judge Buchwald:

I represent Mr. Lopez Padilla in the above captioned matter. On March 17, 2022, Mr. Lopez Padilla was released on bond with the condition that his wife (Lozary Lopez), a United States citizen, surrender her passport, which she did. We write with the consent of the government and pretrial to respectfully request the release and return of Ms. Lopez' passport to her. Earlier this morning, Ms. Lopez' aunt passed away in the Dominican Republic and she would like to travel either tomorrow or Friday to assist her grandparents (eighty-four and seventy-eight years old) in the burial of her grandfather's sister.

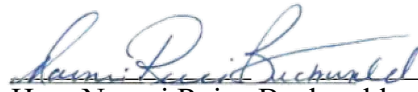
Therefore, counsel is respectfully requesting that the Court modify Mr. Lopez Padilla's bail conditions, and order the release and return of Lozary Lopez' passport to her immediately. Your Honor's consideration to this application is appreciated. Thank you.

Respectfully,

N. Todd
Natali Todd, Esq.

cc: AUSA Kevin Mead (via email)
Marlon Ovalles, PTSO (via email)

SO ORDERED


Hon. Naomi Reice Buchwald
United States District Judge

Date: June 29, 2022
New York, NY